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Attorneys for Plaintiff
LISA CORSON

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

LISA CORSON,

Plaintiff,

vs.

GREATER PALM SPRINGS
TOURISM FOUNDATION dba
GREATER PALM SPRINGS
CONVENTION AND VISITORS
BUREAU,

Defendant.

Case No.: 5:22-cv-00736-JWH-PVC

**APPLICATION FOR ENTRY OF
CLERK'S DEFAULT**

Plaintiff LISA CORSON ("Corson"), by and through her undersigned counsel, hereby requests that the Clerk enter default in this matter against GREATER PALM SPRINGS TOURISM FOUNDATION dba GREATER PALM SPRINGS CONVENTION AND VISITORS BUREAU

1 (“GPSCVB”), hereto on the ground that GPSCVB has failed to appear or
 2 otherwise respond to the Complaint within the time prescribed by the
 3 Federal Rules of Civil Procedure.

4 The Declaration of Matthew L. Rollin in Support of Motion for Entry
 5 of Clerk’s Default (“Rollin Decl.”) filed concurrently herewith demonstrates
 6 that on May 2, 2022, GPSCVB was served with the Summons and the
 7 Complaint by Substitute Service, by serving Jasimine "Doe", front
 8 desk/person-in-charge, a person apparently in charge thereof, at GPSCVB’s
 9 Registered Agent, Ms. Lena Wade, 1800 East Tahquitz Canyon Way, Palm
 10 Springs, California, 92262. Copies of the Summons and Complaint were
 11 then mailed via First Class Mail, postage fully pre-paid on May 2, 2022
 12 addressed to GPSCVB’s Registered Agent, Ms. Lena Wade, 1800 East
 13 Tahquitz Canyon Way, Palm Springs, California, 92262.

14 The time allowed for GPSCVB to respond to the Complaint has
 15 expired. Neither Corson nor the Court has granted GPSCVB an extension of
 16 time to respond to the Complaint. GPSCVB has failed to answer or
 17 otherwise respond to the Complaint, or serve a copy of any Answer or other
 18 response upon Corson's attorney of record.

19 Corson is informed and believes that GPSCVB is a corporation and is
 20 not considered an infant or incompetent person. Corson is informed and
 21 believes that the Servicemembers Civil Relief Act does not apply.

22 WHEREFORE, Plaintiff Lisa Corson requests that a default be
 23 entered by the Clerk against Greater Palm Springs Tourism Foundation dba
 24 Greater Palm Springs Convention and Visitors Bureau and for such other
 25 and further relief as to the Court deems just and proper in the premises.

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 27 DATED: June 6, 2022

Respectfully submitted,

28 /s/ Matthew L. Rollin

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